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May 11, 1994

DOCKET FILE COPY ORIGINAL

A. Richard Metzger, Esq.
Acting Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D. C. 20554

Re: CC Docket No. 92-166

Dear Mr. Metzger:

Constellation Communications, Inc. ("Constellation") is a pending applicant to construct and launch a low-Earth Orbit satellite system that will provide Mobile Satellite Service (See Application File Nos. 17-DSS-P-91(48) and CSS-91-013). Constellation has been participating in numerous Commission proceedings relating to the allocation and assignment of frequency for this service including CC Docket No. 92-166. On May 5, 1994 Constellation submitted to the Commission its comprehensive comments in response to the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. On the same day all the other pending applicants submitted comprehensive and necessarily voluminous comments in response to the NPRM. Comments were also submitted by 26 other interested parties. These comments contain extremely complicated technical and legal analysis of the issues presented in this proceeding as well as many complex proposals for changes to the frequency assignment plan and specific rules proposed in the NPRM.

Reply comments are presently due to be filed with the Commission on June 6, 1994. Given the volume and complexity of the Comments filed on May 5, 1994, Constellation does not believe that there is sufficient time provided to adequately review and analyze the initial comments and prepare Reply Comments. This situation is exacerbated because initial comments in response to the FCC Notice of Inquiry in IC Docket No. 94-31 (World Radio Conferences) are also due June 6, 1994. This proceeding is also of critical importance to Constellation and other parties involved in CC Docket No. 92-166 because of the inter-relationship between certain issues in the two dockets.

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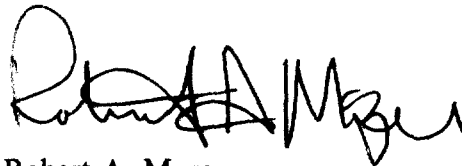
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In light of the above, Constellation respectfully requests that the Commission grant a 30 day extension of time, until July 6, 1994, in which to submit Reply Comments in CC Docket No. 92-166. This 30-day extension of time should not have an adverse impact on the timing of the FCC consideration of the issues in this proceeding and will result in a substantially higher quality record on the Commission's proposals. It will enable all the interested parties to prepare full and complete comments in both CC Docket No. 92-166 and IC Docket No. 94-31. TRW Inc., which filed a request for a two week extension in this proceeding has been informed of this request for a 30 day extension and has indicated that it would not object.

If there are any questions on this matter please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert A. Mazer". The signature is fluid and cursive, with the first name "Robert" and last name "Mazer" being the most legible parts.

Robert A. Mazer
Counsel to Constellation
Communications, Inc.

cc: All Parties on Service List

CERTIFICATE OF SERVICE

I, Robert A. Mazer, hereby certify that a copy of the foregoing document was served by first-class mail, postage prepaid, this 11th day of May, 1994 on the following persons:

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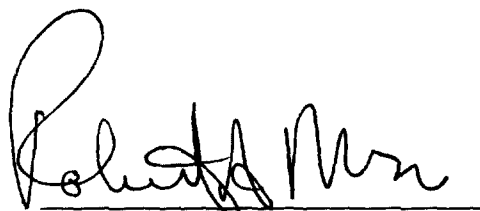
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